

Monica Perales  
Attorney at Law: 297739  
12631 East Imperial Highway Suite C-115  
Santa Fe Springs, CA 90670  
Tel: (562)868-5886  
Fax: (562)868-8868  
E-Mail: rohlfing.office@rohlfinglaw.com  
Attorneys for Plaintiff  
ARTHUR R. VALDEZ

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ARTHUR R. VALDEZ	)	Case No.: 2:24-cv-00907-DMC
Plaintiff,	)	
v.	)	STIPULATION TO EXTEND TIME
	)	TO FILE MOTION FOR SUMMARY
MARTIN O'MALLEY,	)	JUDGMENT; ORDER
Commissioner of Social Security,	)	
	)	(FIRST REQUEST)
Defendant.	)	

TO THE COURT:

Plaintiff Arthur R. Valdez and Defendant Martin O'Malley, Commissioner of Social Security, by and through their attorneys, stipulate, subject to this court's approval, to extend the time from June 19, 2024, to July 24, 2024, for Plaintiff to file his Motion for Summary Judgment, with all other dates extended accordingly. This is Plaintiff's first request for an extension. This request is made at the request of Plaintiff's counsel to allow additional time to fully research the issues presented.

//

1 Counsel's autoimmune-compromised mother, for whom she is a caretaker,  
2 has fallen ill due to a significant lupus flare, requiring additional medical care.  
3 Consequently, counsel has had to take the last two weeks off to attend to her  
4 mother's medical needs.

5 The parties request that the briefing schedule be modified as follows:  
6 Plaintiff will file his Motion for Summary Judgment by July 24, 2024. Defendant  
7 will file his Cross-Motion for Summary Judgment by August 23, 2024. Plaintiff  
8 may file any optional reply within 14 days of the service of the Commissioner's  
9 Cross-Motion for Summary Judgment. The parties make this request in good faith  
10 with no intention to unduly delay the proceedings.

11 DATE: June 18, 2024

Respectfully submitted,

12 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

13 /s/ *Monica Perales*<sup>1</sup>

14 BY:

Monica Perales

15 Attorney for plaintiff Arthur R. Valdez

16  
17 DATE: June 18. 2024

PHILLIP TALBERT

United States Attorney

18 MATHEW W. PILE

Associate General Counsel

19 Social Security Administration  
20  
21  
22  
23  
24

---

25 <sup>1</sup> Counsel for the plaintiff attests that all other signatories listed, and on whose  
26 behalf the filing is submitted, concur in the filing's content and have authorized the  
filing.

/s/ *Justin L. Martin*

BY: \_\_\_\_\_

Justin L. Martin  
Special Assistant United States Attorney  
Attorneys for defendant Martin O'Malley,  
Commissioner of Social Security  
[\*authorized by e-mail]

**ORDER**

Based upon the stipulation of the parties, and for cause shown,  
IT IS HEREBY ORDERED that the briefing schedule is amended:  
Plaintiff's Motion for Summary Judgment due: July 24, 2024; Defendant's  
Cross-Motion due: August 23, 2024; and Plaintiff's optional reply due:  
September 6, 2024.

**IT IS SO ORDERED**

**Dated: June 26, 2024**



\_\_\_\_\_  
DENNIS M. COTA  
UNITED STATES MAGISTRATE  
JUDGE

**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:24-CV-00907-DMC**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on June 18, 2024.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Monica Perales*

---

Monica Perales  
Attorneys for Plaintiff